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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY d/b/a VERIZON (Alternative Regulation Plan - Sixth Price Cap Compliance Filing)

DTE 00-101

SECOND SET OF INFORMATION REQUESTS SUBMITTED BY
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

Pursuant to the Hearing Officer memorandum issued on December 6, 2000, in this docket, AT&T hereby submits the following information requests to Verizon-MA.

Instructions.

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon-MA subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon-MA's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon-MA cannot answer a request in full, answer to the extent possible and state why Verizon-MA cannot answer the request in full.
6. If Verizon-MA refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon-MA's Massachusetts intrastate operations.

Information Requests.

1. Please refer to Section B, Tab 1, page 1 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to each of the residence service offerings listed - Sound Deal, Sensible Minutes, Local Package, Bay State, Metropolitan/Bay State Metropolitan, please identify from your Section C, Tab 1, and reference by section and page each and every specific rate element associated with each of the services.

2. Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth

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Annual Price Cap Compliance Filing ("Filing"). With respect to the Sound Deal service offering that became effective on September 12, 1999, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from September 12, 1999 to December 31, 1999.
- b. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- c. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- d. With reference to your response in (a) and (b), what percent of Verizon's customer base in MA does this represent?
- e. With reference to your response in (c), what percent of Verizon's customer base in MA does this represent?

3. Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Sensible Minute Plan service offering that became effective on December 23, 1999, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from December 23, 1999 to December 31, 1999.
- b. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- c. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- d. With reference to your response in (a) and (b), what percent of Verizon's customer base in MA does this represent?
- e. With reference to your response in (c), what percent of Verizon's customer base in MA does this represent?

4. Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Local Package service offering that became effective on February 13, 2000, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from February 13, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- c. With reference to your response in (a), what percent of Verizon's customer base in MA does this represent?
- d. With reference to your response in (b), what percent of Verizon's customer base in MA does this represent?

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5. Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Bay State East-Met, Bay State East non-Met Overtime Minutes, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.

6. Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Metropolitan and Bay State Metropolitan Service offering, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.

7. With respect to Verizon's Local Package referred to in question 4 above, please provide number of customers signed up at the end of 2000 for the three categories of pricing plans for Local Package Prime Feature Package, i.e. the number of customers subscribing to (i) month-by-month service plan; (ii) up to 36 months service plan and (iii) up to 60 months service plan.

8. Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Phonesmart Service Features for Residence customers, please provide the following:

- a. Volumes in terms of number of customers that signed up for each feature listed and, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001.

9. Please refer to Section B, Tab 1, page 4 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Phonesmart Service Features for Business customers, please provide the following:

- a. Volumes in terms of number of customers that signed up for each feature listed and, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001.

10. With regard to the ValuePack package that is part of the Sound Deal offering, please answer the following:

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- a. Since the introduction of the ValuePack package what has been the actual volume in terms of the number of customers signed up for the first 12 months of the service?
- b. What is Verizon's forecast for the volume of customers it expects to sign up for the next 12 months of service?
- c. With respect to the response in both parts, please indicate the percentage of Verizon's local services customers that this represents.

11. Please refer to Section B, Tab 1, page 5 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Access, please provide the following:

- a. Average cost of access, month-by-month, from June through and including November 1999.
- b. Average cost of access, month-by-month, from December 1999 to and including June 2000.
- c. Revenues associated with the entrance facilities referred to in the Price Cap filing, month by month, from June through and including November 1999.
- d. Revenues associated with the entrance facilities referred to in the Price Cap filing, month by month, from December 1999 to June 2000.
- e. Revenues associated with the direct trunked transport referred to in the Price Cap filing, month by month, from June through and including November 1999.
- f. Revenues associated with the direct trunked transport referred to in the Price Cap filing, month by month, from December 1999 to June 2000.

12. Please refer to Section C, Tab 1, pages 1-83 of Verizon's October 2, 2000 Filing

- a. Please provide actual quantities sold for each service for which rate elements are listed, for each of the last three years
- b. Please provide a current three year forecast for each of the services listed in response to subpart a.

13. With respect to the excel file titled, "VZ Price Floor Calc 1-10.xls", please provide the source of the revenue figures shown on line 1 for pages, including at a minimum all rates and quantities that develop the revenues.

14. With respect to the excel file titled, "VZ Price Floor Calc 1-10.xls", please provide the source of the minutes figures shown on line 3 for pages and define all services that are included in the count of minutes.

15. For each service for which Verizon proposes rate reductions, please provide the total cost of UNEs that a CLEC would have to purchase from Verizon in order to provide that same service to the CLEC's own retail customers.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC. Untitled

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